

Message

From: Wilson, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=841477851C614E1981C54C0372591BFE-PWILSON]
Sent: 3/15/2018 5:04:34 PM
To: ZIFF, SARA [ZIFF.SARA@EPA.GOV]
Subject: RE: Riverside Ag Notes

Thanks Sara,

The modified language is fine from my perspective – thanks for sharing.

From: ZIFF, SARA
Sent: Wednesday, March 14, 2018 5:11 PM
To: Wilson, Patrick <Wilson.Patrick@epa.gov>
Subject: FW: Riverside Ag Notes

Hi Patrick,

I just received this from Ross at TRC about Ag Park. See what he originally wrote in his message below mine...

Here is my idea of how to respond – please let me know if you have additional or different revisions:

As presented in TRC's November 21, 2017 *Request for Alternative Soil Cleanup Goal*, the remedial goal for soils 10 fbg or deeper assumes that a resident would not excavate deeper than 10 fbg when installing an in-ground swimming pool. This scenario was presented at a Riverside City Council meeting and has been incorporated into the cleanup methodology for the Site. ~~Setting the deep soil cleanup level to 1.0 mg/kg rather than 0.23 mg/kg would not increase the risk to a resident.~~ If soils located deeper than 10 fbg have a PCB concentration greater than 0.23 mg/kg but less than 1.0 mg/kg, these concentrations are considered safe in a residential setting, and would continue to be safe at this depth with or without the presence of a future housing structure and landscaping features.

Thanks,
Sara

^^^^^^^^^^^^^^^^^^
Sara Ziff, P.E.
Project Manager
Corrective Action Section
U.S. EPA, Region 9
75 Hawthorne Street (LND-4-1)
San Francisco, CA 94105
(415) 972-3536
ziff.sara@epa.gov

From: Surrency, Ross [<mailto:RSurrency@trcsolutions.com>]
Sent: Wednesday, March 14, 2018 4:58 PM
To: ZIFF, SARA <ZIFF.SARA@EPA.GOV>
Subject: FW: Riverside Ag Notes

Sara,

I am revising the FRA Ag Park report based on comments received from EPA and DTSC. Just to clarify, is this how you would like the paragraph on page 14 revised?

As presented in TRC's November 21, 2017 *Request for Alternative Soil Cleanup Goal*, the remedial goal for soils 10 fbg or deeper assumes that a resident would not excavate deeper than 10 fbg when installing an in-ground swimming pool. This scenario was presented at a Riverside City Council meeting and has been incorporated into the cleanup methodology for the Site. ~~However, in such a scenario, a resident would not be exposed to such soil for the time period used in DTSC and USEPA risk models to determine a 1×10^{-6} cleanup goal (25 years) but instead would only have theoretical exposure for the excavation period itself, which would be on the order of a few weeks at most. Furthermore, in the swimming pool construction scenario, it would not be the resident, but commercial/industrial (excavation) worker who would be excavating to install the pool that would have a complete exposure pathway (dermal contact, ingestion, and inhalation). Therefore, the resident would not likely be exposed to the PCBs at the 1.0 mg/kg for any measurable time period. Setting the deep soil cleanup level to 1.0 mg/kg rather than 0.23 mg/kg would not increase the risk to a resident. If soils located deeper than 10 fbg have a PCB concentration greater than 0.23 mg/kg but less than 1.0 mg/kg, these concentrations are considered safe in a residential setting, and would continue to be safe at this depth with or without the presence of a future housing structure and landscaping features.~~

Regards,

Ross Surrency, PG
Senior Project Geologist



17911 Von Karman Avenue, Suite 400, Irvine, CA, 92614
T: 949.727.7324 | F: 949.727.7311 | C: 949.283.9257

Follow us on [LinkedIn](#) or [Twitter](#) | www.trcsolutions.com

From: Neal, Greg@DTSC [<mailto:Greg.Neal@dtsc.ca.gov>]
Sent: Monday, March 12, 2018 11:40 AM
To: Surrency, Ross <RSurrency@trcsolutions.com>; Lennon, David <DLennon@trcsolutions.com>
Cc: Tasnif-abbasi, Maryam@DTSC <Maryam.Tasnif-abbasi@dtsc.ca.gov>
Subject: Riverside Ag Notes

Per Maryam please see the below draft thoughts on the report.

Please find EPA's comments on the TRC report below, to follow up on our previous conversation.

1. On page 14, the swimming pool scenario is discussed. The text in that paragraph starting with "However, in such a scenario," should be removed, because we are taking into account not only worker safety during excavation of a swimming pool, but also a scenario whereby soil as deep as 10 fbg is brought up to the surface and used for landscaping. EPA and DTSC have determined that both scenarios are safe.
2. The next paragraph begins with "The 1.0 mg/kg remedial goal for soils located beneath the new roadways meets the 1×10^{-6} conservative risk target [...]" The 1×10^{-6} risk level does not apply to the 1.0 ppm cleanup goal, and reference to 1×10^{-6} risk should be removed.

Report issues by DTSC presented below -

- Tables in pdf version appear different than hard copy. May be just more/less rows per page, but haven't gone page by page
- None of lot by lot reports stamped by registered professional

- Lot by lot report tables indicate screening level is 0.23 and then use footnote to state "DTSC agreed to a cleanup level of 1.0 mg/kg for soil 10 feet or deeper in depth" with no statement about risk in the table. Some lots have greater than 0.23 but less than 1.0.
- Some lot by lot data that represents soil removed is not represented in any table or anywhere else except in lab reports. This can represent issues if a home owner was to see this data in their dataset but not explained anywhere else. Suggest tables like Table 4, 5 or 6.
- The Phase 2 step out/excavation confirmation data is not reported anywhere except in lab reports.
- Confusion about what lab reports exist in "Initial tract 28987 Lot Samples" and what exist in lot by lot reports.....in appendix I reports after 4-5-17 appear to be missing
- Tables 7 and 8 have no resolution for samples above screening level...need to reference other samples which address issues
- Figures appear to present some data that was removed even if below screening levels (i.e. 1624-b9@1, 1623-b9@1, 1625-b2@1)

Thanks

Greg

Greg Neal, P.G.
Engineering Geologist
Department of Toxic Substances Control
Geological Services Branch
Cypress Office
5796 Corporate Avenue
Cypress, Ca 90630
(714) 484-5455